



COUNCIL ON HIGHER EDUCATION

DIRECTORATE:

STANDARDS DEVELOPMENT

**A Framework for Qualification
Standards in Higher Education**

(Consultation Document, November 2011)

SUMMARY OF SUBMISSIONS RECEIVED

March 2012

and

CHE RESPONSES

June 2012

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1. BACKGROUND

In December 2011, the Council on Higher Education (CHE) sent the draft Framework to parties with an interest in higher education, requesting submissions by 10 February 2012. A number of bodies requested, and were duly granted, extensions.

1.1 SUBMISSIONS RECEIVED

As of 16 March 2012, submissions have been received from the following bodies:

Central University of Technology

DaVinci Institute

Durban University of Technology

Engineering Council of South Africa

Higher Education South Africa

National Tertiary Education Union (Rhodes University)

Nelson Mandela Metropolitan University

North West University

PC Training

South African Council for Planners

South African Council for the Landscape Architectural Profession

South African Council for the Property Valuers Profession

South African Council of Social Service Professions

South African Nursing Council

South African Parastatal and Tertiary Institutions Union (North West Province)

The Independent Institute of Education

University of Cape Town

University of Fort Hare

University of Johannesburg

University of KwaZulu-Natal

University of South Africa

University of the Free State

University of the Western Cape

University of Witwatersrand

University of Zululand

Walter Sisulu University

The CHE thanks each of these bodies for its submission.

1.2 SUMMARY

This summary is organised in terms of the main areas of enquiry or/and concern that were identified in the submissions received. Some of the points raised in certain submissions are less relevant to the draft *Framework for Qualification Standards in Higher Education* (the *Framework*) than they are to, for example, the proposed revision of the Higher Education Qualifications Framework, or the draft NQF Sub-Frameworks, or CHE/HEQC roles in quality assurance generally; such points are not included here, unless they have bearing, directly or indirectly, on the *Framework*.

The summary uses extracts from submissions to illustrate various points of view relating to the issues raised. In the interests of an objective evaluation of, in some cases, diverse opinions expressed on particular aspects of the *Framework*, some of the extracts have been subjected to minor editing in order to remove evidence of their origins.

The summary does not include comments that indicate agreement with the general approach proposed in the *Framework*, or agreement with any of its details. On the contrary, the purpose of the summary is to identify issues of general or agreed concern, or issues on which there is a diversity of opinion. These are represented as “Illustrative comments”, and are intended to represent the full range of opinions received.

In the case of each area of enquiry/concern, the major questions raised in the submissions are identified, and the CHE offers its response. **(The CHE responses are in colour.)** The submissions received and the CHE responses will inform an ensuing draft of the *Framework*.

2. THE PURPOSE AND AIMS OF STANDARDS DEVELOPMENT

Illustrative comments

It is ... not clear what the major problem is that the standards framework is intended to address. Developing greater clarity on this is essential for being able to evaluate whether the proposed approach to standards development would meet the purpose for which it is intended (fitness for purpose) and whether the intended purpose itself is appropriate at this point in our history (fitness of purpose).

We agree generally with these principles [Framework, p.7]. The comments here are around the fundamental characteristics. In formulating or engaging with these, the questions that need to be answered are: why develop standards for higher education qualifications? What is it that we are trying to achieve? And where and how are these to be utilised? The characteristics presented here while useful, should take into consideration the answers to these questions.

[W]e want to caution against the assumptions that seem to have permeated the education and training system, including the higher education system. These assumptions include the almost unproblematic acceptance that more regulation – in this case in the form of qualification standards and their association with quality assurance – will solve the problems of the lack of parity of esteem, equivalence between qualifications on the same level of the NQF, articulation and progression possibilities within the system and credit accumulation and transfer.

We are ... not convinced that development of an approach to standards development is what the higher education system in South Africa needs right now. Currently, there are huge variances in the quality of programmes across the system. There are significant inequalities in the resourcing of institutions, and major challenges with respect to governance and management, as evidenced by the number of institutions currently being managed by administrators. These factors have a significant impact on the

capacity and ability of institutions to offer quality programmes. Serious questions need to be asked whether it is appropriate and desirable to allocate scarce resources to standard setting, which given the scope of the exercise, may take a long time to have a positive effect on the system which should, at the moment, be assisted to enhance quality where it counts – in the classroom.

[I]t is with some interest that we observe the introduction of standards setting within the context of the existing framework of quality assurance measures. [We are] not opposed to quality assurance measures or associated standards, however, for these to be effective and efficient then the system must be clear, simple and useful. The sense of resistance to the current quality assurance measures, as an innovation and systemic change, is tangible in some places. It might be, that the effect of these measures still needs to consolidate within the system, the curriculum construction options for students, and, the course offerings of academics. If the response of the HE sector to the introduction of the current measures have met expectations we should by now have been measuring more positive effects on the student outputs across the system. There appear to be institutions that have found difficulty in engaging with the QA system as it stands. The on-going question is to what extent is quality assurance happening in the lecture halls. There is a view that if it's not happening in the lecture halls then it's not happening at all, or at best, it veneers the system.

As noted in the introduction to this submission, the sector recognizes that the CHE has a twin legislative mandate – that of quality assurance and that of standard setting. However, while these two aspects are strongly linked, they are not the same. In our view, in this draft framework document, these mandates are conflated to the extent that there is lack of clarity about the problem being addressed. The document sets out a number of purposes for establishing standards in higher education. The list subsumes a wide range of problems ranging from public prejudices about the quality of programmes (a quality assurance issue), dissatisfaction with the competencies with which many graduates exit higher education (a curriculum issue), a lack of consensus about the characteristics of different kinds of qualification types at the same levels on the NQF (a parity of esteem issue), the absence of benchmarks for comparing graduates of different institutions (a parity of standards issue) and enabling international comparability (an educational system issue). Unless greater clarity is achieved in what the standards framework is intended to address, it is difficult to ascertain whether the draft document would meet its purpose.

In standardising qualifications, the CHE needs to guard against the risk of impacting negatively on differentiation in the sector. The standards setting process should be careful not to compare programmes across disciplines given the differentiated outcomes, context and content. The approach should rather focus on comparing similar qualifications across institutions. This is alluded to on p 6 where it is stated that communities of practice constituting expert groups of peers within particular knowledge fields and disciplines will play a central role in ensuring the validity and reliability of standards.

[W]hile the sector agrees on the need for standards to guide comparative qualifications analyses so that qualifications gained in different disciplinary areas could be seen to be of comparable cognitive demand, we want to issue a strong caveat in respect of the assumptions implied in this ideal namely, that a framework document of this nature could overcome the 'intrinsic logic' (Tuck, Hart and Keevy (2004: 8), which could bedevil the principle of the parity of esteem of such qualifications. 'Intrinsic logic' is described as 'design features, such as flexible pathways and the establishment of equivalences between different qualifications' which intends to enhance parity of esteem between qualifications (Blom, 2006). While the 'intrinsic logic' of common qualification standards therefore suggests that seamless articulation between different contexts will be enabled, more than the design of qualification standards is needed for this principle to become a practical solution to the lack of mutual recognition

and trust within the system. Qualification standards should therefore focus on the cognitive demand in relation to the purpose(s) of qualifications and should not seek to develop a one-size-fits-all approach which ignores the intrinsic value of learning in a particular context.

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There is a general understanding that standards in higher education are intended for guidance and clarity in the design and development of programmes. However, it is also important to highlight the role that standards should play in the appropriate pitching of courses and/or modules, as well as in spelling out levels of cognitive demand and complexity at different levels of qualifications.

The lack of meaningful outcomes of the activities of some of the standards generating bodies is still on people’s minds and it is not clear how the proposed development of standards will differ from the role of the SGBs.

The Institution feels that the accreditation for distance education should be separated from that of contact education. As the modes of delivery are different, this separation will provide a stonger

foundation for addressing relevant key issues with regards to distance learning more meaningfully. The changes in distance education and in quality assurance, both nationally and internationally in the last five years, necessitates a revision of these criteria.

At the same time both, distance and contact delivery of the same qualification, should meet the same standards.

In accrediting qualifications, the importance and critical necessity of a Work Integrated Learning component should be emphasised. Standards with regards to Work Integrated Learning (WIL) should be developed and standardised across all Higher Education Institutions. This is a necessity in adding value to all qualifications for developing critical skills to ensure employability of graduates.

Major questions

1) What problem is standards development actually addressing? How will standards address the problem?

The development of standards is not a reaction to a specific problem. It is, rather, a necessary aspect of implementation of the HEQF, through the establishment of a benchmark for the award of each qualification type. The aim is to enhance public perceptions about consistency between similar qualifications offered by different institutions and in different fields of study. The purpose of a standard is to state an agreed purpose of a qualification type and the graduate attributes that are evidence of the purpose being attained. The standard states what a programme leading to the qualification type intends to achieve and how we can establish that it has been achieved. This would show fitness for purpose.

The approach of the CHE to standards development is an approach that is regarded as appropriate for higher education, and for its sub-framework. Different sub-frameworks may require somewhat different approaches to standards.

2) Is standards development distinctive from quality assurance?

There is a distinction. Standards aim to provide institutions with nationally-established benchmarks for qualifications, that may be used for internal quality assurance as well as external comparison. For HEQC quality assurance, standards will be part of the criteria used in the process. For example, a standard provides the specific qualification-type context in which accreditation Criterion 1 will be applied to institutional programmes..

3) Will qualification standards just mean more regulation of higher education, and greater demand for compliance?

Standards do not intend to increase the amount of regulation of higher education. As statements of what a qualification must achieve, standards should be part of, and inform, the normal processes of programme design, accreditation and review. They will require institutions to meet expectations of quality determined by peers. The standard should be owned by its investors, including the academic community in the field.

4) What implications for, and impact on, institutional differentiation will standards development have?

A key aspect of institutional differentiation is the selection of qualifications that each institution offers. The standards will focus on qualification types, but will not attempt to influence the design and development of programmes that lead to the qualification. The institution's mission, goals, context and priorities will largely influence the range of qualification types that it will offer. If the qualification type has an agreed standard, and the institution's programme meets that standard, it could be approved as part of its range of offerings. Differentiation, on the basis of qualification-type combinations, would be clear, but this would not be determined by the standards themselves.

5) Will standards undermine the intrinsic logic and value of particular learning contexts?

The logic and value of learning contexts is recognised. Qualification standards do not seek to link a qualification type with a particular learning context or range of contexts. Approaches to teaching, learning and assessment methods remain the responsibility of the institution. Standards establish the purpose of the qualification and what tells us that the purpose has been achieved. The match between purpose and the learning context would be evaluated via other quality assurance means, both internal and external.

6) Should standards distinguish between various modes of tuition?

No. Whatever the mode of tuition, there needs to be comparability between what the qualifications achieve. The institution selects the mode of tuition (or combination of modes), and accounts for its compatibility with the qualification.

7) Will qualification standards incorporate standards for work-integrated learning?

Standards assume that different qualification types, and the pathways and fields of study for which they are awarded, have different approaches to the integration of WIL. The starting point for a standard of a qualification is its purpose and how graduate achievements reflect that purpose. Where WIL is fundamental to the purpose and achievements, this will be addressed in the standard, but the standard will not prescribe the ratio of institution-based/work-based learning or the methods by which WIL is to be assessed.

3. CLARITY AND INTERPRETATION OF THE FRAMEWORK

Illustrative comments

[Our] appeal is that: CHE consider use of more user-friendly, clear language that can be more readily interpreted and enforced.

It is evident from the information provided in Sections 2 & 3, as well as Appendix B of the document, that the definition of the term 'standards' differ based on the context, purpose and practice within which it is defined. Due to its varied meanings and interpretations, it is difficult to conceptualise the denotation of the term in the Framework. A short statement to support a common understanding of 'standards' within the South African higher education context applicable to the Framework, may therefore be required.

Institutions ... need a clear explanation of what is meant by a qualification standard and the concepts related to the development and implementation of a set of qualification standards.

The document will benefit from the inclusion of a tentative example/case study of a qualification standard and a glossary that clarifies the terminology used for example, 'professional' 'professional qualifications', 'vocational qualifications' and 'occupational qualifications'.

[Note: other submissions called for clarification of a number of terms used, for example, 'part qualifications', 'level descriptors', 'outcomes', 'assessment criteria', 'graduate attributes', and for clarity on the implications of Figures 2 and 3.]

The controversy about language - many of the terms used, embrace values which might be experienced as inappropriate and threatening to higher education's traditions.

A statement on page 6 'fundamental' difference between qualification standards and other types of standards employed in higher education, but the discussion in Appendices A and B does not draw the line quite as firmly, particularly in relation to 'content' and 'proficiency' standards. The significance of

content standards, especially for qualifications in the general pathway that are not amenable to an 'outcomes-based' approach, should be elaborated in more detail.

In the past, the DOE (DHET) used a very narrow definition of professional programmes (only those qualifications leading to professional registration, i.e. not just *registration* with a professional body, but as *professional* in the field, such as a chartered accountant, or professional engineer), and we accept that this needs to be broadened in the context of the development of new professions and may or may not have generally recognised professional bodies. Nonetheless, there should be some criteria established as to what constitutes professional education because this is a term all too readily claimed in self-definition (I'm a professional dog-minder). The reality in the workplace is that in many fields there is a need for a large number of supporting personnel for each qualified professional.

The questions of conceptual and contextual issues around qualifications (page 14) needs refining. Will there be differentiation between programmes registered as qualifications in their own right? ... The impression provided by the document is that qualification and programme development occur at the same time. In reality, several qualifications have already been registered and programmes leading to these qualifications are then developed. Are standards developed so that programme development can align to these?

[T]here are some instances where more clarity on the difference between qualification and programmes should have been provided. While there should be a common understanding of these as explained in the CHE's Criteria for Programme Accreditation, there is a sense that in some instances the two are collapsed; this may be particularly so when programmes are registered as qualifications in their own right.

Clarification by name needs to be provided for all Diploma qualification types as provided for all the Certificate qualification types. The vocational, professional and general/formative components are well understood in the provided context but devoid of "prefix or names" to qualify the diplomas at 360 and 240 credit levels. When these name gaps exist, institutional points of delivery, related organisations and individuals may want to close these gaps on their own. This may create non-uniformity in the system and consequently frustrate the aim of qualification choice and definition by a potential learner.

Major questions

1) Will the Framework include a glossary of terms?

Yes. A revised Framework will include a glossary of the generic terms. Any terms of relevance to particular qualification types will be part of the standards statements.

2) Will the Framework include an example of a qualification standard?

Yes. However, a single example may not suffice, and a small range of examples will be required.

3) Are qualification standards adequately distinguished from other types of standards?

The Framework aims to clarify the distinction between qualification standards and other kinds of standards, such as teaching, learning and research standards, performance standards, institutional quality assurance standards, etc. Most other standards are related to the level of programmes, rather

than qualification types. The distinction between qualification standards and other kinds will be addressed in a glossary of terms.

4) How will qualification standards be aligned with programme development?

As described above, qualification standards focus on the relationship between purpose and graduate achievements and attributes. They are, in a way, the genus of which each programme with its qualification is a species. Standards are categorically different from the design of specific programmes. While they do not prescribe the curriculum or content of a programme leading to the qualification, programme development will necessarily take them into account, as benchmarks of what the programme ought to achieve.

5) Will the Framework clarify criteria for 'professional' education?

The glossary of terms in a revised Framework will include criteria for the qualification pathways. 'Professional' is one of three qualification pathways referred to in the Framework. In general, the term 'professional' refers to a field of study leading to a professional designation or licence conferred by a recognised professional body. There is no absolute distinction, however, between professional and non-professional programmes; some para-professional fields of study do not lead to a recognised designation. The boundary between professional and non-professional fields of study is porous, and will be influenced by the relationship between qualification outcomes and professional requirements.

4. ROLES IN STANDARDS DEVELOPMENT

Illustrative comments

With regard to the roles of DHET, SAQA and the CHE – will SAQA be responsible for registering qualification standards or will CHE maintain a database? [Item 6 p7-8]

A clear distinction of the different roles of the CHE and SAQA is critical to standard setting. These must be highlighted and overlapping roles should be effectively addressed as no one standard can have two enforcers.

The three Quality Councils in quality assurance and standard settings are the Council on Higher Education, Council for Trade and Occupations and Umalusi. There need to be close co-operation; not just in standard development but also in assessment requirements among the three. The document is silent on how the three councils will align and manage the standards process.

Vocational qualifications (industry-based apprenticeships and institutionally-based training) - who will have oversight responsibility for quality assurance for such qualifications at level 5 and above especially since many public Higher Education Institutions will be offering programmes from level 6 to 10? Figure 5 on p. 24 seems to imply that the Higher Certificate, Advanced Certificate, and the 240 credit Diploma are not in the ambit of the CHE. Who would develop standards for these qualifications?

Major questions

1) How will the CHE role of developer of standards relate to the SAQA role of registrar of qualifications?

It is important to distinguish between standards developed for qualification types, and qualifications (based on the qualification types) awarded by institutions. While, in terms of the NQF Act, SAQA will register higher education qualifications only on recommendation of the relevant QC (the CHE), the actual relationship between the development of qualification types and the SAQA registration of qualifications requires further unpacking.

The CHE 'role of developer' needs clarification. The CHE itself has neither the intention nor the capacity to develop standards on its own. The actual development will be done by expert peer groups drawn from institutions and fields of study or professions, coordinated by the CHE on the basis of a framework approved by the Council.

2) What steps will be taken to ensure close cooperation between the Quality Councils?

There is representation on each QC by members of each other QC, so regular liaison happens. However, over-coordination of the three QCs should be prevented. They operate in different spaces and in different ways appropriate to the needs of their domains. Cooperation would be most relevant at the interface of the three sub-frameworks (for example, progression from NSC/NCV to higher education).

3) Who will be responsible for the development of standards for occupational/vocational qualifications at levels 5 and 6?

Currently this remains the responsibility of the CHE. The draft NQF Sub-Frameworks of the three QCs suggest that responsibility for these levels may require further consultation. It should be noted, however, that CHE standards are based on qualification types and not NQF levels. The notion that a level on the NQF belongs exclusively to a single QC may be counter-productive. The question should therefore be, who will be responsible for the qualification types with those exit levels?

5. THE INTENDED BENEFICIARIES OF STANDARDS

Illustrative comments

With regard to the purpose of standards, the document is silent on the benefit of standards to prospective students.

The standards should be made more explicit and put in the public domain for ease of access for everyone's knowledge. There also needs to be discussions about these standards so that there is a common and shared understanding of them. From the perspective of students, there is a need for models/exemplifiers of these standards. Space needs to be created in the curriculum for opportunities to familiarise students with them.

The ability of the student to respond to, appreciate and incorporate the standards framework into their

Educational choices, responses and responsibilities are as much a prime objective of the introduction of a standards framework as is its effect on the pedagogy and administration of course structures. In this regard there must be clear and simple statements through which the student body can seek to address their problems relating to their expectations and the imperatives for education which contributes to the national interest.

Conceptually, the issue of undergraduate and postgraduate directed standards is not raised. Our view is that the probable success of a framework lies in an overall focus on a framework, initially, directed towards the undergraduate activities rather than the postgraduate level. While making that statement, it must be recognised that one level within a framework that should be addressed (whether as the only level or not) is that of the principles relating to the frameworks of supervision of postgraduate students. The efficacy of this is the building of capacity in the younger cohorts of academic workers.

There can be an even bigger focus on 'communities of practice', more collaboration can add additional value.

It's obvious that the standards framework cannot be vague and that it should not be overbearing – but it appears that the most effective way to introduce both the concept and the framework of standards within the sector is to ensure that the concept and framework are clearly stated and understandable, that it is simple and framed in rational possibilities, but also that it is useful, and, that its usefulness is easily and rationally demonstrated to the communities of practice and the general academic practitioner.

What is of paramount importance to the membership of the [union] is the question of whether standards, more or less ideally applied, change the perception of Government and the public about institutional equality and what HE is, as opposed to FET and training which are currently conflated with HE today? This is not necessarily a form of reputation affirmation as much as it should be a confidence builder and a mechanism to reinstate the public confidence in higher education as a public good and favourable knowledge dissemination platform. The assumption is that the setting of standards is related to teaching and learning delivery as opposed to research and knowledge generation.

The proposed framework if implemented will bring confidence to the broader South African society in the Education Sector. Students and educators will have confidence in the integrity and credibility of qualifications that are awarded at their institutions. It will further ensure that, no Higher Education Institution's qualification fall below a certain minimum standard in the country and that appropriate levels of competence are distinguished. A laudable point is that the introduction of qualification standards will certainly assist weaker institutions and no student will be discriminated.

The paragraph emphasizes roles played by other frameworks and approval of qualifications with excellent results. The CHE may consider creating a comparative view of standards in related higher education elsewhere in the world and conclusions drawn through the identified major deliverables of the compared frameworks and reason(s) why South Africa's chosen framework is of a greater advantage over the others. This would provide a credible argument on developing locally relevant and internationally competitiveness for a better higher education framework of the future.

We encourage the CHE to engage with the sector around possible international projects which may be useful for the sector to become involved in, as part of our quest to improve the capabilities of our graduates, using international instruments.

Major questions

1) What benefit will qualification standards have for students?

Students (and the general public) will be able to check that a programme offered by an institution meets the standards of the qualification type that will be awarded. (Standards are, in turn, used by the HEQC as benchmarks according to which criteria are applied to accredit the programme.) The CHE will need to ensure that standards are published in a form that is accessible to students and the public.

2) Would qualification standards be of equal importance and benefit at all NQF levels?

As mentioned above, different sub-frameworks are likely to have distinctive approaches to standards. In respect of higher education, they will, in principle, be of equal importance, and they should prove to be of equal benefit. It is possible that research-based qualifications – supervised by highly-qualified experts in a field of study – may require a lighter touch than taught (undergraduate) qualifications.

3) How will standards development foreground and integrate communities of practice? Who would the communities comprise, and what would they do?

Qualification types will be developed in consultation with higher education experts in the area of general qualification design. The application of qualification type standards to fields of study will be done in consultation with experts in the relevant fields. Such expert groups will comprise the communities of practice that will participate in standards development. These groups will be authorised by the CHE to perform the tasks.

4) Do qualification standards aim to be of particular benefit to 'weaker' institutions?

Standards do not in themselves make or imply any institutional distinction or differentiation. Addressing the standards, once developed, will be the responsibility of the institution itself, as part of its internal quality assurance, often in liaison with a professional body. In this respect, qualification standards should be of particular benefit in cases where the institution finds that a programme is in need of improvement. The role of the CHE will be to ensure that any programme recommended to SAQA for registration as a qualification meets the standards of the qualification type. Qualification standards will inform accreditation and re-accreditation of programmes, as well as national reviews of fields of study.

6. STANDARDS AND INSTITUTIONAL AUTONOMY

Illustrative comments

A positive feature of this document is that it seeks to strike a balance between the use of qualification standards as both a quality assurance mechanism and an academic development strategy. We are however, concerned about what we see as the potential for over-regulation of the higher education sector by the government and government agencies such as quality councils. Furthermore, the creation of national qualification standards could pose a threat to both institutional autonomy and academic freedom.

We recognise from the tone of the document that the CHE wishes to guard against standards setting resulting in unintended consequences such as the ranking of HEIs and discrimination against those HEIs which are still 'developing' and this is supported. However, the reality is that the target market is doing this presently – the prospective students and their parents/sponsors, by choosing where they want to study; and the employers, by employing graduates from certain HEIs in preference over others due to perceived notions of quality and graduate employability. Furthermore, careful consideration needs to be given to the manner in which standards for higher education qualifications are generated and applied to ensure that a delicate balance is maintained between institutional autonomy and national regulation. The notion of a generative approach to standards setting that allows for innovation, creativity and responsiveness is supported.

[I]t is important to note that national qualification standards will significantly influence institutional policy and criteria that guides the design, accreditation, registration and delivery of programmes. The document does not consider the impact of qualification standards on institutional autonomy and the enactment of institutional vision and objectives in the design and delivery of academic programmes

On p 4 it is acknowledged that there is a need to explicitly define qualification standards as a point of departure since this deficiency could result in a lack of clarity of what is being measured and how this will be done. It is stated that the emphasis is *"...on standards as a developmental guide for programme design and delivery, rather than as rigid instruments for regulating compliance."* A fairly comprehensive set of HEQC criteria are already in place to guide new programme approval and accreditation and the question could legitimately be posed as to how the standards setting process would be done in such a way as to guard against becoming rigid compliance.

The notion of moving from decision-making based on internal/hidden conventions to publicly debatable open principles appears laudable although politically weighted – as we feel that institutions should be able to defend their decision-making and practice (p.7) – but realise that this could also be construed by some as undermining the autonomy of and respect for the academic community signalling almost a distrust that academics seek to make the best decisions based on the best information available.

The document recognises the fact that higher education institutions do have various means of maintaining qualification standards, for example admission requirements to qualifications, student /staff ratios and the most commonly used system of external examiners. Against this recognition of institutional means of maintaining standards, the document suggests nationally developed qualification standards, arguing that the institutionally set standards are localised and institutionally controlled and do not allow of comparability of the quality of qualifications. This raises the issue of institutional autonomy and national regulation. There are valid reasons for both approaches. The problem that arises then is that of how to maintain a balance between institutional autonomy and institutional accountability.

The higher education sector supports the CHE's approach in respect of retaining 'existing, internal means of quality control over qualifications', such as the peer review and external examiner systems. In fact, the sector believes that an approach to standards through the strengthening of the criteria and general transparency of inter-university moderation would enhance the improvement of the quality of undergraduate education in all institutions. At the same time, it would help to build communities of practice which can be a resource in advising on improvements in curriculum, pedagogy and assessment, which take account of contextual specificities and orientations of institutions.

Yes, higher education needs to take cognisance of the differences in providers – but bullets 1 to 5 tend to focus on sensitivities around institutions, but these are standards for all qualifications – assuming nationally? Universities have autonomy and exercise their differences in the programmes offered and how the teaching takes place. The emphasis should be that standards development will not be an impediment to this. However, what probably needs to be engaged with is how the differences in universities will influence standards of generic qualifications, since these are covered by most institutions.

Although the HEQF regulates a single qualifications framework, the qualification standards needs to accommodate for the similarities and differences of qualifications within the ambit of contextual differences given the various types of institutions (e.g. Universities and Universities of Technology). As a means of accommodating the various types of institutions, one may rely on the aforementioned contextual-conceptual spectrum of knowledge. E.g. Universities of Technology seems to offer more contextual development programmes while universities are known for the general formative offerings that are based on conceptual (theoretical) knowledge. This is however not a dependable supposition, as institutions offer different types of qualifications that are underpinned by the various domains of knowledge. One may therefore ask, how will standards differentiate between a B-degree offered at a traditional university and a B-degree from a University of Technology? *Recommendation: Elaborate on the avoidance of a 'one-size-fits-all' approach, given the fact that the qualification types are part of a single qualifications framework that is contextualised to fit the needs of various types of higher education.*

Most would also probably agree that this is an on-going **process** (p5) involving a **community of practice** (p6) in sharing understandings on core curriculum questions of the kinds posed on pp. 19/20

of the consultation document. This might usefully be a feature of the work of national associations linked to particular professions such as teaching, nursing, social work etc.

While it is admirable that a set of standards may, even though expert panels and peer contribution, emanate from within the cohort of academics and communities of practice it's difficult to envision this with effective and efficient outcomes when institutions are in competition with each other to the extent that those in South Africa appear to be. It's more difficult when Government overlays the system with PQM and other "management" strategies. All of the latter contributes to the making of an unclear, complex and useless system. As part of keeping clear and simple, in principle, moving with the communities of practice is more likely to avoid negative effects on the diversity of academic thinking: and, the ability of academics to engage creatively within the standards framework is absolutely desirable. It's essential, from the [our] perspective, that the academic still be within a dynamic and relatively unrestricted environment of knowledge exchange and collaboration. We therefore oppose a "hard" version of a framework of standards.

Major questions

1) How will standards affect institutional autonomy and academic freedom? How will they ensure a balance between autonomy and accountability?

Because they do not determine the curriculum, content, methods of delivery or assessment of programmes, qualification standards should not affect institutional autonomy and academic freedom. They will affect institutional accountability in the sense that qualifications awarded by the institution will need to meet publicly-accessible standards for the qualification type.

2) How will standards accommodate contextual and institutional-type differences? Are the differences represented (or implied) by a contextual-conceptual knowledge spectrum or by the notion of qualification pathways?

Standards inform qualification types, irrespective of the institutional type where they are awarded. References to qualification pathways and knowledge mixes are intended to assist institutions in matching their qualification offerings with their mission, goals, priorities and contexts. They do not imply any kind of categorisation of institutional types, nor do they in themselves place limitations on the qualifications that an institution may offer, as long as it is able to meet the standards for those qualifications. It is not the function of qualification standards to determine the PQM of an institution, or how it may vary from time to time. An expert community of practice will determine the particular conceptual-contextual blend that a qualification type should have, and institutions should decide (subject to PQM approval) what qualification types they are best able to offer, and in what fields of study.

3) It is generally agreed that standards should not result in any kind of institutional ranking, but ranking happens anyway (in the marketplace), so would standards development have any additional (negative) effect?

The only 'ranking' relevant to qualification standards is the 'ranking' of the NQF levels. Because the standards address qualification types, any ranking of institutions based on the programmes they offer leading to those qualifications would be beyond the scope or control of the standards themselves. Qualification standards may indeed have the positive effect of ensuring that criteria for any 'marketplace' ranking of institutions is based on nationally-established benchmarks for the qualifications that institutions award.

4) Will the aims of standards development (including the promotion of institutional autonomy and academic freedom with accountability) be compromised by other 'management' strategies, such as PQM approval or SAQA registration?

Qualification standards are not intended to add an additional layer of regulation or compliance on higher education institutions. On the contrary, they aim to establish benchmarks that are developed with the assistance of those most closely involved in the design, development and delivery of higher education programmes, through consultation with experts in the higher education sector. Because they do not address specific programmes, they do not determine, for example, PQM approval and SAQA registration. Once they have been developed, they may facilitate a better understanding of what underpins PQM approval and SAQA registration.

7. RELATIONSHIP WITH PROFESSIONAL BODIES

Illustrative comments

With regard to professional bodies that have a legislated mandate pertaining to the standard of qualifications, e.g. HPCSA, does this change their role/function? If so, roles/responsibilities need to be clarified at a national rather than institutional level with associated MoUs being signed between the CHE and relevant body. How will current challenges with regard to some professional bodies directly influencing curriculum design be overcome? How will current challenges pertaining to over-regulation of professional programmes by professional bodies be overcome? The relationship between professional bodies and the Qualification Council for Trades and Occupations is a further consideration. What are the implications for self-accreditation?

Pragmatically, the CHE does not have the expert capacity to develop all the required standards, especially in the professions. The professions have the necessary peer expertise. The CHE may be able to approve standards for compliance with general guidelines but will have to rely on the professions for expert approval. In due course, it will be necessary to formulate a relationship between the CHE and the professions that recognizes this reality.

On p 8 it is stated that *"...the CHE is given authority to establish standards for all higher education qualifications, but it should do so in close consultation with professional bodies, which perform a separate function of setting requirements for professional designation/registration. There should be no serious disjuncture between these processes and the standards that emerge from them."* In general this is sensible, but caution should be exercised that this does not evolve into professional bodies prescribing to HEIs. Our experience ... is that, in qualifications that require the professional registration of graduates, academic staff members often prioritise the requirements of the professional body over the requirements of CHE or the institution. The role of professional bodies in setting standards for HE qualifications therefore needs to be clarified in relation to the standards setting framework suggested by the CHE.

While the CHE is given authority to establish standards for all higher education qualifications, it should do so in consultation with all interested parties including governmental and Professional constituencies. Professional bodies, which perform a separate function of setting requirements for professional designation/registration, should be consulted and their role in the process should be clearly delineated. The objective of consultation would be to ensure coherence between the process and the standards that are ultimately developed.

What might need clarification here is the professional body link. Professional bodies in the main set requirements for programmes leading to qualifications, therefore concentrating at the qualifier. Should it therefore be assumed that qualification standards are the base and professional body requirements are in addition to and above these?

Even though the CHE has been given authority to establish standards for all higher education it is important that this should not only be done in close consultation, but also in close collaboration with professional bodies.... It is then such professional bodies that are best able to announce on the comparability of programmes leading to qualifications.

[This professional body supports] the emphasis on the approach that the CHE sets standards for qualifications whereas regulatory bodies set requirements for professional practice. This is an important distinction that the [professional body] notes, as it sets the tone for the different roles of the CHE and regulatory bodies and eliminates confusion of roles within the sector.

This framework holds numerous implications for [this professional body] in terms of legislation, structure and functions. Once the document is finalised and accepted, there will have to be a lot of collaboration, careful discussion and re-alignment, particularly pertaining to professional boards to be established for new occupations.

In cases where standards for higher education and criteria determined by recognized professional bodies differ, CHE in collaboration with such professional bodies should provide explicit guidelines instead of specific HEIs having to deal with the professional body on their own. The preferred situation is to have the same criteria and standards as opposed to having ‘not fully aligned’ requirements.

[The] CHE in this document differentiates between CHE “standards” and “criteria” set by Professional Bodies. If the differentiation is not properly understood it could lead to tension between professional bodies and the providing institution especially on the “standards” set for ancillary content of the professional programme.

Major questions

1) How will standards influence or affect the relationship between the function of the CHE as quality assurer and the professional body function of setting requirements for professional designation or registration?

The Framework proposes a gradation from qualification type (for example, a Bachelor’s degree) to a qualification in a particular field of study (for example, a Bachelor’s degree in Engineering). The award of the qualification will need to meet the general standards of that type, irrespective of the field of study. This implies that the CHE will be responsible for ensuring that all awards of a qualification type, irrespective of the field of study, meet the qualification-type standards. As far as particular fields of study are concerned, the curriculum, content and delivery of a programme are the responsibility of the awarding institution. Qualification standards focus on outcomes and attributes that the qualification imparts to the student. The standards are developed by academic communities. The relationship between the award of a qualification and the extent to which it meets a professional body’s requirements for designation is a matter that needs to be resolved between the awarding institution (or the sector as a whole) and the relevant professional body. However, the development of qualification standards in consultation with communities of practice implies that representation from professional bodies will be essential in all cases where the application of generic qualification types to specific fields of study needs to be informed by particular professional requirements. This should help to ensure compatibility between the institution’s qualification and the requirements of the professional body.

2) Is there a clear distinction evident between qualification standards and professional criteria for designation/registration?

In principle, there is a distinction. Professional designation must be registered by SAQA separately from qualifications. Qualification standards recognise the autonomy of higher education institutions to design, deliver and assess the programmes that lead to the institutional award of a qualification, provided that they meet the standards for the qualification type. Criteria for designation/registration as a professional are the prerogative of the relevant professional body. In the process of development of qualification standards, the CHE intends to ensure, through its establishment of communities of practice where they affect professional fields, an appropriate representation of institutional and professional interests. The structure of these groups is likely to differ from case to case.

3) In the development of standards, what form of, and structure for, consultation with professional bodies would be appropriate?

(Answered above.) In the case of qualifications leading to a recognised professional designation, participation by professional bodies is essential. In cases of professional or para-professional fields of study that do not have legislated bodies, the consultation process will need to be determined, on a case-by-case basis, by the CHE. In all cases, the principle of a peer group of academic experts ought to be paramount.

8. DELEGATION TO HEIs OF CERTAIN FUNCTIONS

Illustrative comments

A further outflow or result for institutions with a high standard of compliance as identified by the CHE, might be to be granted delegation of identified Quality Assurance functions. The CHE might perhaps evaluate the effectiveness of institutions in specific functions when accrediting or reaccrediting programmes, during Institutional and/or national reviews, before awarding institutions the delegation of functions.... The CHE might perhaps evaluate the effectiveness of institutions in specific functions when accrediting or reaccrediting programmes, during Institutional and/or national reviews, before awarding institutions the delegation of functions.

[The higher education institution supports the] relationship between both the development of qualification standards and of self-accreditation approaches.

Changes in the legislative environment have assigned responsibility for standards for all higher education qualifications to the CHE. As such, the continued relationship with both public and private HEI's will be a necessary condition for assuring standards. We encourage the CHE to remain in touch with intellectual and disciplinary developments by collaborating and drawing on discipline experts in the sector at appropriate times during the process of developing standards. In the long-term, capacity building amongst peer academics from a variety of institution types may foster an acceptance of standards as well as provide a context for self-accreditation processes. This move to 'greater self-regulation' would be encouraged. The University fully supports the concept of our responsibility for the quality of what we do. We urge the CHE to consider including provisions (as appropriate) throughout the drafting of the proposed framework to entrench the rights of institutions to quality assurance their qualifications in a manner that is in alignment with the intention of the proposed framework.

The reservation is about the lack of clarity on the possible future *self-accreditation status* referred to in point 3. In our professional field, it would not be possible, for example, to accept a declaration from a provider that a qualification meets a standard, as judged by an unknown internal process.

The [institution] supports the views on developing an appropriate blend of standards as presented in the Framework. Efficiency will greatly depend on how well the blend is composed. In this regard criteria may be required to ensure that an effective and efficient blend of standards is compiled. Such criteria should include: Detail on how relevance, validity and reliability is to be achieved, particularly in instances where self-accreditation increases....

Another problem is that of relating standards development to self-accreditation. What will be the basis for comparison in the case of self-accreditation institutions?

Major questions

1) Will qualification standards influence, in any way, the process of delegation of functions and of self-accreditation of institutions?

The development of qualification standards on the one hand, and the delegation of functions and the self-accreditation of institutions on the other, are different processes. Standards will influence (but not determine) institutional status because one of the guiding principles should be evidence that an institution demonstrates that it can develop and deliver, on a sustained basis, qualifications that meet the standards.

2) Can standards development be regarded as a step towards greater institutional self-regulation and autonomous quality assurance?

In principle, it should be a step in that direction. In practice, it will depend on the extent to which institutions apply qualification standards to the programmes they currently offer, and the programmes that they design. Standards should not be self-regulatory in the narrow sense of being construed as instruments of compliance but, rather, as a means of institutional quality control and a means for adjudging national (and international) comparability of qualifications. They are intended as a means of self-improvement where improvement (based on national or international benchmarks) is called for.

3) How would any form of self-regulation of qualifications be aligned with professional body criteria for designation?

(Answered above.) The relationship between qualification standards, institutional autonomy for the design, delivery and award of qualifications, and professional body criteria for designation/registration, is a matter that will arise during further consultation with communities of practice towards the development of qualification standards and their application to particular fields of study. It is unlikely, however, that professional bodies will accept entirely internal control of quality in respect of professional requirements.

9. STANDARDS WITHIN THE NQF “NESTED” APPROACH

Illustrative comments

[T]here needs to be the recognition that in developing standards, we have to manage the conceptual space between the abstract and the concrete and between the general and the particular. It is therefore necessary to be very clear where qualification standards are situated – hence the importance of the nested approach. For qualification standards to be useful, they need to be at the general level. Greater specificity may too easily lead to prescription and straight-jacketing of institutional innovation and initiative. What could be helpful to academics when designing their programmes and to peers when making these quality judgments of programmes, could be some national qualification standards that they could use as minimum benchmarks against which to assess the quality – on the understanding that these standards are always reinterpreted and recontextualised into particular historical and institutional contexts.

On pp. 11 and 12 it is suggested that the development of standards will contribute to “aligning” the NQF level descriptors with the HEQF qualifications and their stated purposes and characteristics. It would be beneficial if this can be achieved in a way that makes the application of standards “...as simple and transparent as possible” (i.e. the fourth fundamental characteristic listed on p 7), since this is not currently a feature of the level descriptors.

The generation of qualification standards should, at least initially engage with NQF level descriptors in order to make them more context specific (qualification types, qualification variants, and academic fields and disciplines) – though the resultant development of qualification standards may make the formulation of NQF level descriptors redundant.

It may be advisable to investigate whether either the level descriptors could not be converted into qualification standards, or that the level descriptors are replaced by the qualification standards.

[T]he NQF Level Descriptors in their present form may be problematic when locating the standards for actual programmes that, by all other measures, are fit for purpose. Contextualisation is necessary in developing standards at the designator level....The level descriptors cover ten categories A to J. Some of these are particularly applicable in educational programmes while other are more suited to occupations and professions. For example, the level of responsibility and accountability and the expectation of a student to take responsibility for the learning of others are excessive for educational qualifications. For example, does one expect a level 7 graduate to take accountability for the decision and actions of others (category J)? An education qualification cannot have all the attributes A to J, nor could an occupational qualification.

To ensure ...alignment, it is imperative that standards reflect level descriptors and vice versa. It is also imperative that level descriptors cover all offerings. What is unclear at this stage is the application of level descriptors within vocational, professional and generic qualifications as level descriptors will be interpreted differently in these qualifications. This differentiation may be significant in terms of standards that reflect a student's academic achievement, as opposed to standards that reflect a student's practical skills, which in turn will impact on the application and interpretation of level descriptors within different qualification orientations. This raises questions regarding the level of complexity and whether this will be addressed when formulating standards for qualifications.

Major questions

1) What is the proper relationship between NQF level descriptors and qualification standards in higher education?

In the 'nested' approach of the HEQF, NQF level descriptors form the 'outer and most generic layer of qualification specification'. We have the odd situation that standards are being developed when the 'outer layer' has never been officially approved, and is considered inadequate to the task of qualification specification. The level descriptors aim to cover all offerings at a particular level, including whole qualifications, part-qualifications and non-qualification courses. With such broad scope, their generic nature needs to be refined to represent the purpose and characteristic of each qualification type. Level descriptors should therefore inform, but not pre-determine, the standards for qualification types. Whereas there is only one set of descriptors for each level, there are, in many cases, more than one qualification type, and each type requires a standard that is distinctive of that type.

2) Are all NQF level descriptor categories equally appropriate for all qualification pathways and levels?

Certain level descriptors are, arguably, more appropriate for some qualification pathways than they are for others. For example, a level descriptor relating to 'ethics and professional practice' would be relatively more significant for a professional pathway qualification than for one on the general pathway. While all categories of descriptor would have some relevance at all NQF levels, their relative

weighting would vary from one level to another. Developing a set of level descriptors that meets the needs of all qualification types and fields of study is likely to prove futile. An alternative is for qualification standards to be aligned with an appropriate selection of descriptors of the SAQA variety.

10. THE NOTION OF A 'RANGE OF STANDARDS'

Illustrative comments

Whilst we support the avoidance of interpretations of terminology that can lead to notions of *hierarchies, rankings or classifications*, standards should NOT form the basis for any kind of ranking between higher education institutions. The use of terms such as 'threshold', 'typical' and 'best practice' standards will lead to the 'labelling' of certain institutions. The framework and associated processes should recognize good practices without supporting the notion of hierarchies.

In our professional field, there is no longer debate about the level (in the sense used in this section) of the standard: it must be a **threshold** standard, that is, the minimum achievement appropriate to the purpose of the qualification.

We support the idea of a set of developmental levels, with 'threshold' constituting minimum standards to be met, followed by 'typical' and 'best practice' standards to which an institution might aspire.

[T]he CHE notes that qualification standards will not be used as instruments for compliance or minimum requirements for qualifications (pp. 4 – 5). It can therefore be assumed that standards will not be used as threshold, but rather reflect normative characteristics that will manifest in similar programmes. In terms of the domains and levels at which these standards aim, it is necessary to distinguish between the domains and levels. It is however valuable to consider that the levels and respective domains of standards are not necessarily mutually exclusive. Depending on the qualification, one domain may have relevance to other domains that could support the development of standards.

The distinction between **threshold / minimum** standards, **common / typical practice** and **desirable best practice / paragons** is a welcome addition to the discourse and allows for standards to be flexible and custom-made to particular needs and situations (p30).

The idea of a "range of standards" (pp 20-21) can be questioned. The idea of setting standards is that they should inform whether a particular higher education institution has met the minimum standards for a particular qualification. In this regard, the distinction between 'threshold', 'typical' and 'best practice' standards is an important consideration. It seems that one should work with minimum or threshold standards as a baseline and rather guard against attempting to define 'best practice' standards which could inadvertently result in the ranking of HEIs - an outcome which the CHE has stated it wants to avoid at all costs. It is acknowledged that there will always be programmes with a reputation of being 'better', but this should be determined by market forces and not legislated or prescribed.

The recognition of the importance of Higher Education Institutions (HEI's) to promote their own internal processes of quality assurance together with the development of standards could potentially play a role in developing and assuring quality. The sector has well established standards for Higher Education (HE) qualifications, however localised these might be. A range of standards that set threshold standards and identify best practice would be welcomed. This will allow the sector to move

developmentally from minimum standards to best practice. The value of a framework would be the establishment of an agreed matrix of benchmarks for evaluating institutional practices and awards.

“Range of Standards” model: the document refers to the possibility of distinguishing between threshold, typical and best practice standards, and links this to the notion of proficiency standards, thereby implying that at least in certain qualification types it is possible to achieve varied levels of proficiency. This is an interesting approach that may be helpful in the work of standards generation, but which requires further clarification. Firstly, it would be useful if more clarification could be provided with respect to the difference between a “performance standard”, which the document seems to dismiss as inappropriate to the work of standards-generation, and a “proficiency standard”. As both performance and proficiency can be judged in terms of specific criteria, it could be argued that when applied to a construct such as student mastery of knowledge, skills and applied competence, the two concepts are interchangeable. The discussion document seems to jump around between different definitions of performance standard, decoupling them from individual student success in one instant, but in another linking them to the problematic notion of outcomes-based education which surely is about individual performance? And if performance standards can be about teaching standards or standards of infrastructure, why can they not also be about student performance? So, in a nutshell, what make a performance standard different from a proficiency standard? Secondly, it may be very difficult to separate different gradations of performance, such as threshold, typical and best practice standards.

If we have standards which are normative, the fact of establishing them will show up the differentials and disparities within the system. To some extent this is an inevitable consequence of any standard based system and it could be argued that making standards transparent is desirable because they could provide benchmarks for improvement. We would however then need to develop a strategy for dealing with these differentials in a way that would accommodate positive diversity in the system whilst eliminating diversity associated with a legacy of inequality. If we are not able to do this we will end up merely fuelling notions of a hierarchy within the system and exacerbating existing tensions between institutions; or we would, as a result of political pressure, produce ‘low threshold’ standards as the explicated norm, but one that many academics will ignore.

Whilst supporting the idea of setting a threshold level, the document is of the view that standards should go beyond the threshold level, if they are to be a guide to institutions for internal quality development. We support the idea of above-threshold indicators as a guide to an institution’s internal quality development.

The implications of the differential resourcing of different universities appear not to have been considered as a factor in relation to uniform standards. The on-going internal development and undertaking of certain institutions to move from threshold standards to best practice will require additional resources.

How will good practices already established be carried over? What cautions should be heeded? Is the CHE intending to develop a Good Practice Guide with regard to communities of practice and their role in developing qualification standards?

Major questions

1) What danger is there in a ‘range’ of standards being used as a measure of institutional hierarchy?

Institutional views on the matter vary considerably. Some support the notion of a ‘range’ while others regard standards as exclusively threshold statements. The Framework emphasises the point that

standards, in whatever form they are expressed, should not be regarded, or used, as an instrument for creating institutional hierarchies. Institutions themselves should find it beneficial to use standards as benchmarks for their own internal quality assurance processes.

At least initially, standards will be developed as threshold standards. During their development, the feasibility and potential benefit (if any) of a 'range of standards' will be assessed. It may be found that the notion is more practicable in certain fields of study than in others, or at certain NQF levels than others.

2) What potential does a 'range' of standards have to be a guide to internal institutional quality development?

Institutions would, as and where appropriate in terms of their own programme evaluation, have the incentive of standards to strive to move from threshold to improved practice. This could be done through a gap analysis, identifying gaps between the actual and the target.

3) Should qualification standards be complemented by some form of good/best practice guide?

If qualification standards are restricted to threshold statements, it is proposed that the statements of standards should be complemented with some form of illustration of good/best practice. Such complement should, however, be represented in a form that is not construed as prescriptive, or that may constrain initiative and innovation. Above-threshold practice may, for example, take the form of illustrative examples. However, generic illustration would have to be interpreted according to the specific characteristics of fields of study, disciplines and professions.

11. QUALIFICATION 'PATHWAYS'

Illustrative comments

[We] strongly caution that the notion of the purpose-orientation of qualification pathways (vocational, professional, general formative) must never become linked to differentiation between institutional types. The framework for the development of qualification standards should enshrine the principle of '*parity of esteem*' with regard to these qualification pathways.

A clear differentiation between vocational, professional and generic qualifications is also required so as to assist higher education institutions to determine the type and scope of qualifications to be developed within each orientation. It may, for example be helpful to provide a guideline ratio in terms of competence, skills and knowledge applicable to each orientation and qualification level.

In broad agreement with the sentiments expressed, however the development of standards on the basis of a matrix of three qualification "pathways" that reflect the contextual-conceptual spectrum of relevance and coherence. The appropriate ratio [mix] between the contextually relevant and conceptually coherent is a huge challenge. How much of each, how are they related? Thus the articulation between the three pathways will always be an area of contestation.

The categorization of the HEQF qualification types into a spectrum of pathways assists with the conceptualisation of the proportion of contextual and conceptual knowledge within a qualification type. The framework allows for the differentiation of different qualifications within a single pathway. Institutions should be tasked with ensuring that a programme is linked to a qualification and to an appropriate pathway. Attempts should be made to allow institutions the freedom to offer different pathways depending on their missions and available resources and expertise.

Figure 2 (pp. 16) illustrates the mix of knowledge, skills and applied competence for the various qualification types. This is however a very broad guideline to the design of programmes and raises some concern. Can it be assumed that the knowledge, skills and applied competence that underpins a learning programme is a generic measure that guides institutional decisions, or will specific measures indicate the 'ratio' of knowledge, skills and applied competence for respective programmes? The aforementioned blend of knowledge, skills and applied competence applies to the qualification pathways that are embedded in the HEQF. The qualification descriptors in the HEQF¹ discuss progression and articulation routes for each qualification type and do not prohibit students to articulate from a vocational into a general formative pathway, provided that the student has attained sufficient conceptual knowledge in cognate fields. The proposed framework suggests specific blends of knowledge, skills and applied competence for the respective qualification types. The latter may impact on students' articulation to different pathways, as qualifications might not provide sufficient knowledge in a specific domain. *Recommendation: The proposed framework needs to clarify whether the proposed contextual-conceptual framework accommodate for differences in the various programmes that leads to a specific qualification. It is also necessary to indicate how the 'ratio' of knowledge, skills and applied competence (cf. Figure 2) will impact on articulation and progression between the pathways embedded in the HEQF.*

On p 17 reference is made to the fact that the HEQF does not "...deal with issues of programme purpose, contextual-conceptual coherence, and the appropriate blend of knowledge, skill and applied competence" and that this is the "...gap that standards development proposes to fill." The concluding sentence rightly points out that this process will be a complex, contested matter since it will be difficult to reach agreement on all such issues. Given [our] experience as a comprehensive university, [we] strongly recommend that the intricacies of how the contextual-conceptual continuum plays itself out in different qualification types at different levels should not be regarded as a matter that can be normatively prescribed in a national standards setting framework.

The logic of this section and Figure 2 in particular, is based on a simple model where different forms of learning (at a given level) are located on a one-dimensional spectrum. At one extreme there are "trades and occupations in which procedural knowledge and work-based skills are paramount" (contextual). At the other extreme, "formative programmes ... emphasize declarative or conceptual knowledge" (conceptual). The implication that there is a simple trade-off between theory and practice can be misleading. Three pathways are proposed based on the location on the contextual-conceptual axis, namely vocational, professional and general. This classification is acceptable provided that it is regarded as having porous boundaries and does not result in bureaucratic rules for different types. The reality is that no qualification is purely conceptual or purely contextual and that the combination of conceptual and contextual demand is not a simple trade-off. The discussion of the NQF level descriptors above is relevant. We noted that ten competencies are defined at each level, ranging from knowledge oriented (conceptual) to acceptance of responsibility in a real situation (contextual). We also noted that an academic qualification could not realistically be expected to satisfy all ten outcomes. At a given level, there is a complex trade-off between different categories of outcomes.

Major questions

1) What danger is there of qualification 'pathways' being linked to, and an influence on, differentiation between institutional types (within the sector, and between the public and private sectors)?

¹ Higher Education Qualifications Framework, Appendix 1, Government Gazette No. 30353, 5 October 2007

See the responses in Sections 2 and 6 above. Pathways are intended to inform differentiation between qualification types but not between institutions, the latter being determined by institutional PQMs. Qualification standards make no distinction between institutions that offer those qualifications, whether they be public or private. There will be correlation, however, between institutional mission and goals, and the pathway(s) that characterize the programme offerings.

2) Are pathways to be linked to institutional mission, goals, resources and capacity?

Yes: see above, but the links will not be set by the standards statements.

3) Will standards specify (or else guide) ratios of contextual-conceptual knowledge, and knowledge-skill-applied competence for different pathways?

Standards will guide (but not specify) ratios of knowledge mix on the basis of the purpose and characteristics of the qualification type, as described in the HEQF and expanded on in standards statements. It would be counter-productive to try to write rules for contextual-conceptual mixes that are supposed to apply to the pathways.

4) Are pathways to be construed as indicative, descriptive or normative as they apply to qualifications?

Mainly indicative, definitely not normative.

12. HOW MANY LAYERS SHOULD STANDARDS ADDRESS?

Illustrative comments

We do not support the development of standards to the level of sub-field/s (beyond 1st order CESM).

It has already been argued in the document that the NQF level and HEQF qualification type (and variant) description are inadequate as standards. As a general principle the level of detail chosen should not encourage an explosion in the number of standards. The sensible level (at least for undergraduate qualifications) therefore seems to be the HEQF designator (e.g. Diploma, Bachelor's Degree) in a broad field. This agrees with our experience. For example, we have a single standard for the professional bachelor's degree. Providers offer programmes in traditional areas, cross-disciplinary fields. These conform to a baseline knowledge profile and must all meet the defined exit-level outcomes. No disciplinary content is specified. The appropriateness of the detailed content is a quality assurance issue carried out by peer evaluators with disciplinary knowledge. Not following this approach would result in a plethora of standards and regimentation of providers. (Extract edited.)

On the one hand, greater specificity for the sake of ease of quality assurance makes assumptions about the ease with which there could be consensus about curricula and practices (and the extent to which such specificity could stifle creativity and innovation). On the other hand, less specificity reduces the quality assurer's ability to align the broad level descriptors and/or the generic minimum threshold standards in the programme accreditation framework with specific qualification standards. Neither of these two options seems satisfactory.

Pertaining to the development of qualifiers within the same designators (Section 10.4), [we are] in agreement that it may not be necessary to develop separate standards for sub-fields or disciplines within fields. However, clear guidelines from the CHE are required in cases of exceptions.

Within the layers of the so-called “nested approach” to qualifications design, standards generation will therefore need to be sufficiently specific as to deal with qualification variants and particular fields and disciplines. However, the University agrees with the discussion document that it is not necessary at this stage for standards development to address the layer of qualification specialisations.

Recommendation: The HEQF clearly explains the purpose, rationale and nature of qualification types. The qualification standards that are set should be distinguished from the HEQF and qualification descriptors. In this sense it is necessary to clarify the domain and nature of the standards. Will these apply to the qualification variant e.g. BA (History) as is the British case?

We acknowledge that there is little to no evidence to demonstrate that the standards that are currently applied to a master’s degree in medicine for example are comparable to the standards required for a master’s degree in Arts. This is an issue of concern since using the same standard may imply that a master’s may not be a master’s even though these qualifications may be on the same NQF level. The uniformity of the standards between institutions that constitute a particular qualification such as the Master of Medicine for example should also be addressed. The sector should adopt the view that a master’s is a master’s irrespective of the designator or the institutional type awarding the qualification. The parity between qualifications and qualification types remains an issue of concern.

On what layer should the focus be? Limiting standards to qualification types would result in a manageable number but not yield much information. However, if they were to be extended to designators the result would be a multiplicity of standards that is difficult to manage. We accept the idea expressed at the end that in the initial phase of standard development the qualification types and their associated fields would be limited.

Another area mentioned is the use of external examiners; we agree with the document that these have been discipline based, but add that probably in the majority of cases these are at best at course/module level. This might therefore mean that in the majority of cases there has not been standards at the level of majors or programme (qualifier) and apart from entry requirements into qualifications, not much else. The contention is that while it is more realistic to develop standards for qualifications, consideration should be given to how this will translate into the expectations at point of delivery and exit.... While there is broad agreement with the purpose of standards presented, the difference between programmes and qualifications should be made much clearer. As explained in table 3 qualification standards probably should consider the designator level rather than qualifier level. In a majority of cases higher education operates around generic qualifications with students majoring in various areas, but there are also well defined focused programmes – qualifier level. However professional bodies go further and develop standards for specific programmes. Certainly, at national level standards will have to remain at qualification level. This is also where other issues of clarification need to be discussed – Diplomas and Postgraduate Diplomas do not have designators and these qualifications come in several permutations – therefore what should be considered in standard setting. Would this mean going back to convener institutions setting standards for specific areas? How about postgraduate diploma which may be fairly specialised and specific to institutions?

Given that qualification standards would of necessity be pitched at a high level of abstraction, we do not believe that they would add significant additional value to the HEQF itself, or that qualification standards would end up looking very different from the level descriptors or the generic minimum threshold standards in the programme accreditation framework....Notwithstanding our concerns about generic standards we would discourage the CHE from shifting to developing standards at the

level of designators because we believe that on-going developments in knowledge fields would soon render more specific content based standards obsolete.

The danger ... could be that the more generalised the standards framework the less likely it is to be taken seriously. On the other hand the more specific and the harder the approach, the more negative the effect is likely to be on the nature of academia as a pursuit. Clearly, neither of these is desirable. It is therefore acceptable that the CHE advocates a developmental approach to standards setting.

Major questions

1) Given the diversity of opinions expressed, is there any reason for the CHE to change the approach proposed in the Framework, at least during a pilot phase?

Not at this stage. It is a starting point that can be reviewed after a pilot project on standards development has been completed and evaluated.

2) How will the layers selected for standards development relate to the programme criteria set by professional bodies for designation/registration?

Refer to Sections 7 and 8.3 above. Qualification standards will form an 'outer layer' of qualification specification for the accreditation of programmes by the HEQC. The need for standards to be developed for fields of study at a more specialised level than qualification types and descriptors will need to be considered on a case-by-case basis, and the relevant professional body would be consulted accordingly.

3) Would a broad understanding of standards benefit from a clear distinction being made between a qualification *standard* and a qualifier/discipline/subject *statement*?

Standards begin at the level of qualification type. It is proposed that these be applied to broad fields of study. Descriptors or statements at the discipline/subject level are currently beyond the scope of standards development, but may be considered by the CHE as a separate initiative, as and when they are required.

13. GRADUATE ATTRIBUTES

Illustrative comments

The standard must specify the outcomes that the programme must produce to fulfil its purpose and must not specify how the providers must implement the programme. Given that the agreed purpose of qualification standards is that providers should not be told how to implement programmes, the following are inappropriate constituents of standards: student progression (within the programme), graded student achievement, detailed curriculum, pedagogy and assessment criteria. We specifically exclude assessment criteria for the following reason. It would be true to say that in a unit standard at a low level of the NQF (e.g. Tighten a left-hand thread nut to a prescribed torque) can and should have well-defined, unique assessment criteria (e.g. measure torque to within 1Newton-metre). However, at the upper levels of the NQF, for example level 8, it has been our experience that valid assessment methods and criteria for a particular outcome can take on several forms (for example, there are several valid approaches to problem solving). Prescribing assessment criteria therefore violates the principle that the standard must specify what must be achieved and leaving to the provider the

decision on how to achieve it (including how the students learn and demonstrate that they have met the exit level outcomes).

The description of graduate attributes, as referred to in Section 8 of the Framework, should be extended to include higher order thinking skills, analytical, as well as problem-solving and decision-making skills, as these do not necessarily reflect in 'procedural' knowledge, nor does the issue of ethics. Although ethical practices are mentioned in the level descriptors, it is essential that it is included as a standard. This will assist in developing in graduates the transferable skills needed in the 21st century to adapt to unfamiliar or uncertain situations.

Whilst there are on-going debates about the value of using learning outcomes or graduate attributes in curriculum design, there are continued calls from employers for higher education institutions to develop methods of assessing the generic capacities of graduates, such as critical thinking, analytical problem solving skills, ability to manage diversity, ethical reasoning, ability to engage in independent enquiry, and environmental sensitivity. Several initiatives have been launched internationally to test different approaches. We encourage the CHE to engage with the sector around possible international projects which may be useful for the sector to become involved in, as part of our quest to improve the capabilities of our graduates, using international instruments.

“Outcomes” versus graduate attributes: The point is taken that outcomes are a contested notion, and that they may be more applicable to unit standards or to fields in which knowledge domains are essentially hierarchical or cumulative. So on page 20, the document distinguishes “outcomes” from the more preferable concept of “graduate attributes”. Yet on page 33, the document reverts to referring to “outcomes” and the way in which they manifest the purpose of the qualification. The question is whether “outcomes” cannot be understood in a manner that is not behaviourist, and which merely attempts to indicate the blend of knowledge, skills and applied competences which the qualification attempts to develop. Thus: can “outcomes” be understood in the same sense as “graduate attributes”?

The first most intriguing notion is that of the principles and characteristics of standards in higher education and the idea that qualification standards should be an embodiment of constitutional values (e.g. efficiency, effectiveness, social justice, human rights, equity, redress, democracy, and development) and mediate between diverse influences. These principles are doable and easily achievable but will force most qualifications to be MIT, i.e. Multi-trans disciplinary qualifications that are highly commendable Models for the 21st Century.

The only concern is the omission of the concept ‘values’ which seems not to have been considered as a learning outcome domain. Figure 2 has a learning domain of competence, skills and knowledge. It is with the understanding that **values** refers to “the moral or principles or accepted standards of a person or group (Collins English Dictionary and Thesaurus 1995:1287), which it would seem appropriate to include a consideration of values as part of the contextual spectrum across disciplines. It is with an understanding that people who qualify from educational programs develop particular values to act in the service of humanity.

Major questions

1) Are graduate attributes identical to outcomes? If there is a difference, how is it to be defined?

Although outcomes and graduate attributes should not be construed as mutually exclusive, outcomes refer to knowledge, skills and competences that have been demonstrated through formal assessment.

Graduate attributes speak to values, attitudes, critical thinking, ethical and professional behaviour, and the capacity of a graduate to take what has been learnt beyond the site of learning. The significance of graduate attributes relative to demonstrated outcomes will vary from field to field. They will be of particular importance for qualifications that lead to professional or vocational practice.

2) Can graduate attributes include (in a meaningful way) generic capacities such as ethical practice, independent enquiry, environmental sensitivity, and constitutional values?

Achieving this *in a meaningful way* will not be easy, especially in cases where such attributes are reflected more in attitudes than in the concrete demonstration of specific knowledge or skills. However, there is considerable international research on high-impact educational practices that lend themselves to the manifestation of these graduate attributes. What is required emerges from statements of what a graduate is able to do or show. An example from a professional field: 'analyse given situations for ethical issues and propose approaches to addressing the issues detected'.

14. ARTICULATION

Illustrative comments

Concern about the validity of the highlighted assertion:

- Guarantee the recognition of learning credits for students moving from one qualification to another or one educational provider to another;

In this framework document CHE is acting under the NQF Act and therefore obliged to respect, advance and/or achieve the following elements of the NQF Act

- S5 (1) (b), reading "*The objectives of the NQF are to ... facilitate access to, and mobility and progression within, education, training and career paths*"; and also
- S5 (3) (a) reading "*SAQA and the QCs must seek to achieve the objectives of the NQF by ... Developing, fostering and maintaining an integrated and transparent national framework for the recognition of learning achievements*"

While it is correct that no guarantees are to be provided, CHE is compelled to facilitate learning achievement mobility by mitigating barriers.

According to the NQF Act there should be articulation between the different sub-frameworks. There should thus be coherence between the standards established at the exit level of one framework and the appropriate entry level of another. The effect of standards on articulation between qualifications on different levels as well as qualifications on the same level such as a Postgraduate Diploma and an Honours needs further deliberation. The current formation of the NQF appears to emphasise vertical progression with the perception that an honours graduate would be more suited to a masters rather than a horizontal articulation into a Postgraduate Diploma. Greater understanding of the Higher Education Qualifications Framework (HEQF) over time may address this but this could hamper the process of articulation between qualification types.

Therefore, an important question that the standards development process will need to address is how students may negotiate the boundaries between qualifications and programmes that have a primarily contextual orientation and those with a primarily conceptual orientation. This question is very important for the development of articulation pathways and a credit accumulation and transfer scheme.

Clarity is required with regard to articulation of higher education programmes, in particular those offered by UoTs, with vocational qualifications offered through the Departments of Health, Agriculture, and Labour etc.? Who would develop standards for these qualifications? It is ... the institution's view that minimum criteria should be set for similar programmes offered in different institutions.... This will facilitate a smooth transfer from one institution to another and at the same time fulfils the purpose of the qualification.

Types of Knowledge: While the discussion document differentiates between contextual and conceptual knowledge, it does not address the more vexed question of the extent to which contextual or procedural knowledge and conceptual or theoretical knowledge can be reconciled with each other. Indeed at some points, the document seems to assume that contextual and conceptual knowledge can be mixed in an essentially unproblematic manner. An important question that the standards development process will need to address is how students may negotiate the boundaries between qualifications and programmes that have a primarily contextual orientation and those with a primarily conceptual orientation. This question is very important for the development of articulation pathways and a credit accumulation and transfer scheme. Related to this question is the diagrammatic presentation in Figure 2 on page 16. The direction of the arrows seems to imply that in certain qualifications there is a movement from a contextual base to include some aspects of conceptual knowledge, while the reverse may be true in other cases. While it is understood that the diagram merely serves an illustration, it will be important to investigate and test further how and the extent to which this type of movement can take place within specific qualification types and variants.

Vocational qualifications (industry-based apprenticeships and institutionally-based training) - who will have oversight responsibility for quality assurance for such qualifications at level 5 and above especially since many public Higher Education Institutions will be offering programmes from level 6 to 10? Figure 5 on p. 24 seems to imply that the Higher Certificate, Advanced Certificate, and the 240 credit Diploma are not in the ambit of the CHE. Who would develop standards for these qualifications?

P 25 – reference is made to the need for standards to be developed first followed by the development of articulation criteria for the transfer of credits; does this mean that until standards are developed there will be no articulation?

The sector ... agrees that qualification standards cannot 'guarantee the recognition of learning credits for students moving from one qualification to another or one educational provider to another', but in accordance to the NQF Act (Act No. 67 of 2008), the CHE is compelled to facilitate learning achievement mobility by mitigating any unnecessary barriers which may exist.

[Agree] with the statement made in the Framework that more detailed information is required to explain articulation routes for vocational qualification exit-levels 5 & 6. This is particularly important if the decision is taken that Higher Certificates at level 5 and Advanced Certificates at level 6 should not remain on the HEQF. The question is then how students who have completed these level qualifications would be accommodated within the HEQF?

The issue of articulation must be clear as the framework proposes 240 and 360 credit qualifications with the same title. E.g. A diploma with 240 credit qualification articulates with a 360 credit qualification; the former is vocational and the latter professional.

Currently there is a lot of confusion on articulation between Public Institutions and Private Institutions. Generally Private Institutions students encounter rejection on the basis of their existing

qualifications. If the same standard apply to all institutions, then articulation and smooth transition from one institution to another will be facilitated.

In the event that the certificate programmes are classified as vocational, a clear articulation map should be developed, that shows the vertical and horizontal route with higher qualifications on the professional pathway. Effort should be made to differentiate between those Advanced Certificates that fall under the professional path and those that fall under the vocational path, despite the fact that they aspire to the same generic outcomes described by the NQF level descriptors.

The idea that there should be “coherence between the standards established at corresponding levels of the sub-frameworks” is strongly supported in the light of the requirement for clearer articulation between a variety of institutions in the post-school sector and the qualifications they offer, and the universities, as expressed in the recently released *Green Paper for Post-School Education and Training*. This has the potential to become a very difficult issue if the proposal is accepted that NQF levels be removed (DHET, 2012:74) and current levels are replaced by a much looser ‘hierarchy’ of qualifications.

Major questions

1) What role should qualification standards play in:

- negotiating boundaries between primarily contextual and primarily conceptual programme orientations;
- articulation with occupational/vocational qualifications offered outside of higher education institutions;
- articulation between qualification pathways;
- articulation between qualification variants (e.g., 240-cr and 360-cr diplomas);
- transfer from one institution to another (public-public, private-private, private-public)?

Qualification standards will guide articulation between qualification pathways and programme orientations. However, higher education qualification standards (unlike standards for sub-frameworks dealing with national qualifications) do not engage directly with the curriculum and content of programmes. Because matters relating to articulation and transfer are determined largely at the level of curriculum content and sequence in programmes, and because they are issues to be handled by and between institutions on the basis of their respective programmes, the influence of qualification standards on these matters will be accordingly limited. While they will have value in establishing benchmarks for progression from one qualification to a higher qualification, they will have less influence on specific credit accumulation and transfer between qualifications or between institutions. Higher education standards are not designed to interfere with institutional rights and responsibilities in these matters.

2) Are policy and procedure for articulation and credit transfer dependent on standards development?

Only indirectly, if at all.

15. TIMEFRAMES AND INITIAL FOCUS

Illustrative comments

What is the anticipated timeframe for implementation given that over 10 years have elapsed since the debate on standards was initiated? In the best interests of the country this phase of implementation needs to be much faster. However, caution is required: the process must be manageable. Safeguards should be put in place to ensure that the development of standards does not degenerate into a prescriptive 'Report 151 approach'.

[We are] in broad agreement with the proposed way forward outlined on p 26 since it is clear that the consultation processes promise to be inclusive and that many more interactions will take place before 'binding' rules or criteria are formulated. However, there will be a need to assess the capacity constraints of higher education institutions, especially in cases where the HEQF alignment processes are placing inordinate demands on academic and academic support staff to engage in large-scale recirculation of qualifications. A thorough assessment will need to be done of how the standards setting processes will be rolled out and whether this will be done parallel to the HEQF implementation since there is the potential for this to become cumbersome and counter-productive in enhancing quality in higher education.

The problem of system overload, even if unintentional, needs some discussion. The University welcomes the next phase to pilot standards development with a sample of qualifications and the assistance of academic staff in the sector. In a system where institutions are ultimately responsible for quality, self-regulation and for looking at curricula from a student's point of view, it could be argued that it is consistent with the principle of ownership of quality for an institution or the HE sector to play an active role in developing standards. However, the volume of work that will result from the large number of programmes in the whole system raises concerns. The cost to the system in terms of working hours is large, and will be magnified by the number of programmes that form part of the pilot project. We thus support a pilot project within disciplines leading to a manageable number of standards within the sector.

One issue that needs to be taken into serious consideration is that speedy finalisation and operationalization are needed. Past experience has shown that the sector tends to be in limbo when operationalization is delayed.

Section 10.3 states that in the initial (pilot) phase of standards development, a number of qualification types and fields associated with those types will be selected. More detail is required on how the selection of qualification types and fields will take place and when the pilot phase will commence.

With respect to qualification types and their variants, it is recommended that the three year diploma and the three- and four-year Bachelor's Degrees should be priority area, as: i) much attention needs to be paid to clarifying the knowledge properties of professional and general-formative degrees; ii) It is important to clarify when a diploma belongs to the vocational and the professional track – in order to inform programme design but also the development of access and articulation routes; and iii) the problem of student dropout rates is integrally related to the need to develop appropriate curricular structures (or pathways) and forms of student support linked to the knowledge properties of the specific qualification types and their variants.

We appreciate the distinction made in the document between the highly generic nature of level descriptors and proposed approach to standards which will recognise "distinctive and differentiated knowledge bases" (p11). Nonetheless, there are constraints on how far the path of distinctiveness can

be pursued when discussions turn to the issue of implementation. This follows after a careful and detailed account of how the appropriate mix of knowledge base, skills and applied competence will differ across qualifications and would have to be assessed in the process of establishing standards (p17). On the one hand there is commitment to specificity, but on the other, recognition that this will be impossible to implement below the level of the first-order CESH categories for each of the qualification types. The document deals with this tension by asserting that there will have to be a further level of 'adaptation' of standards for the qualification types in a field when these are applied to specific programmes. We suggest that, in addition to careful selection of members of each expert group to cover a range of sub-fields within a first-order CESH category, there should be a trial period or pilot study in which standards that are generated are applied in a variety of contexts (different academic sub-fields but also by the HEQC in its accreditation process) to assess their validity and usefulness.

Further clarification of the meaning of '*reasonable durability*' is required [third bullet p7].

What is envisaged with regard to the 'shelf-life' of qualification standards and the review cycle? It is anticipated that the review cycle will be established and will be transparent.

Major questions

1) What effects should other CHE/HEQC processes (HEQF alignment, national reviews, institutional reviews) have on the timeframe for standards development?

There will be alignment with other CHE/HEQC processes, including developments in respect of the draft NQF Sub-Frameworks, especially finalisation and promulgation of the revised HEQF. There are significant implications in the revision for standards development, at a number of NQF levels, such as the proposals for new variants of qualification types. However, finalisation of a Framework and establishment of expert reference groups for a pilot phase will proceed, based on the assumption that the revised HEQF will, with minor changes if any, be approved.

2) Will there be any detrimental effects on the sector if the CHE commences with a pilot phase and critical assessment prior to full implementation?

No, there should not be any detrimental effects. A pilot phase is imperative and its main benefit will be a further opportunity for the CHE to consult with the higher education sector before proceeding to full implementation.

3) What qualification types and/or fields are candidates for a pilot phase?

Initial work is focussed on the bachelor's degree and the diploma (and their proposed variants). The pilot phase will develop qualification-type standards, and their application to a small number of disciplinary fields, guided by the CESH categories. The pilot phase may also include new variants of existing qualification types (for example, a professional doctorate).

4) What is the anticipated 'shelf-life' of a qualification standard?

This cannot be cast in stone. The 'shelf-life' should extend for as long as the standard for the qualification type is deemed to remain current. Depending on disciplinary, inter-disciplinary and field developments, the 'life' may vary from one qualification type to another. In general, a 'shelf-life' of 5-8 years may be considered as a benchmark.